

Division Director

State of Utah DEPARTMENT OF NATURAL RESOURCES DIVISION OF OIL, GAS AND MINING

355 West North Temple 3 Triad Center, Suite 350 Salt Lake City, Utah 84180-1203 801-538-5340

0045

May 27, 1992

Mr. Glenn Zumwalt, Vice-President Utah Fuel Company P. O. Box 719 Helper, Utah 84526

Dear Mr. Zumwalt:

Re: <u>Deficiency, Compliance with Division Order dated April 20, 1992, Utah Fuel Company, Skyline Mine, ACT/007/005-92F, Folder #3, Carbon County, Utah</u>

The Division has completed the review of information you submitted to comply with the Division Order accompanying the vacation of NOV N92-37-1-1. Most of the information has been provided, however there are a couple of minor changes that still need to be addressed. Please review the enclosed technical memo which discusses the outstanding issues and respond to them by June 17, 1992.

If you have any questions, please call me or Priscilla Burton.

Sincerely,

Daron R. Haddock Permit Supervisor

Q. Haddock

cc: P. Burton NOVORDER.LET



Division Director

State of Utah DEPARTMENT OF NATURAL RESOURCES DIVISION OF OIL, GAS AND MINING

355 West North Temple 3 Triad Center, Suite 350 Salt Lake City, Utah 84180-1203 801-538-5340

May 25, 1992

TO:

Daron Haddock, Permit Supervisor

FROM: (4)

Priscilla Burton, Soils Reclamation Specialist

RE:

Compliance with Division Order. Utah Fuel Co. Skyline Mine. ACT/007/005-92F. Folder #2. Carbon County. Utah.

SUMMARY:

A response to the Division Order vacating N92-37-1-1 was received 5/18/92. Items 2.1 and 2.2 have been adequately addressed. Item 2.3 has not been adequately addressed. The requirement to commit to written annual evaluations of contemporaneous revegetation on the conveyor bench was not clear within the MRP.

ANALYSIS:

ITEM 2.3

A commitment to visually evaluate the treatments annually is stated on page 4-45A.

Results of Experiment 3 (only) will be included in the annual report (pg 4-45A).

A confusing statement on page 4-45 states that "revegetation analyses were conducted annually during the first five years..." A more precise statement would read, "revegetation analyses were conducted annually from 1980 to 1985..." Written this way, the statement absolutely clear.

RECOMMENDATIONS:

Utah Fuel Co. should reword page 4-45 to indicate the years in which annual revegetation analyses were reported to the Division.

At a minimum, page 4-45A should clearly state that visual evaluations of all experimental practices and trials being conducted will be reported in the Annual Report.

Quantitative measures of evaluation would be preferable to visual evaluations, but a revision of evaluation practices is not called for in the scope of Division Order 92F.